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*Attorneys for Defendants Roembke Turnkey  
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and Gregory J. Roembke*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

EMULAIT, INC. f/k/a PROXAMAMA, INC.,

Plaintiff,

vs.

ROEMBKE TURNKEY SOLUTIONS, LLC,  
ROEMBKE MFG. & DESIGN, INC., and  
GREGORY J. ROEMBKE,

Defendants.

Case No. 2:24-cv-02267-APG-NJK

**FIRST AMENDED STIPULATION  
AND ~~PROPOSED~~  
ORDER TO EXTEND DEADLINE TO  
FILE RESPONSE OR ANSWER TO  
COMPLAINT  
(FIRST REQUEST)**

On January 2, 2025, the parties filed their first stipulation seeking approval of their extension to respond or answer the complaint. ECF 12. The Court denied it, without prejudice, for failure to comply with the local rule requiring the parties to state the reasons for the extension sought. ECF 13. The parties file this first amended stipulation to comply with the local rule.

Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Defendants Roembke Turnkey Solutions, LLC, Roembke Mfg. & Design, Inc., and Gregory J. Roembke and Plaintiff Emulait,

1 Inc. f/k/a Proxamama, Inc. (collectively “the parties”), hereby stipulate and agree to an extension  
2 of time for Defendants to answer or respond to the Complaint as follows:

3 1. On December 6, 2024, Plaintiff filed a Complaint against Defendants. ECF 1.

4 2. On December 13, 2024, Defendants were served with a copy of the summons and  
5 Complaint. ECF 11.

6 3. The deadline for Defendants to respond to the Complaint is on or before January  
7 3, 2025, 21 days after service of the summons and Complaint. Fed. R. Civ. P. 12.

8 4. Defendants requested an extension because of conflicts with the holidays between  
9 service on December 13, 2024, and the response deadline of January 3, 2025. In particular, Mr.  
10 Roembke was traveling on a pre-planned vacation on Friday, December 27, 2024, not returning  
11 to the office until Monday, January 6, 2025, so defense counsel have not been able to work with  
12 the client and client representative on the preparation of a response to the complaint over the past  
13 week. Additionally, defense counsel also arranged for vacation time with their families in  
14 conjunction with the holidays.

15 5. The parties agree to allow Defendants an extension of time within which to  
16 answer or otherwise respond to the Complaint. To file an answer to the Complaint, Defendants  
17 shall have an additional 21 days, through January 24, 2025. To file any other kind of response to  
18 the Complaint, Defendants shall have an additional 14 days, until January 17, 2025.

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6. This first request for an extension of time to respond to the Complaint is in the spirit of efficiency for both the parties and the court.

Dated: January 3, 2025

Dated: January 3, 2025

KAEMPFER CROWELL

FOX ROTHSCHILD LLP

By: /s/ Louis M. Bubala III

By: /s/ Rex D. Garner

Louis M. Bubala III

Rex D. Garner, Bar No. 9401

Kristopher J. Kalkowski

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*Attorneys for Defendants Roembke Turnkey Solutions, LLC, Roembke Mfg. & Design, Inc., and Gregory J. Roembke*

*Attorneys for Plaintiff Emulait, Inc. f/k/a Proxamama, Inc.*

IT IS SO ORDERED.

  
~~U.S. DISTRICT COURT JUDGE~~  
U.S. MAGISTRATE JUDGE

DATED: January 3, 2025

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